



January 29, 2021

**VIA ECF**

Hon. Thomas J. McAvoy  
Senior U.S. District Judge  
Federal Building and U.S. Courthouse  
15 Henry Street  
Binghamton, NY 13901

**Re: *United States v. Jacob Delaney*; 1:20-CR-335 (TJM)**  
**Redactions to Motion to Suppress and**  
**Supporting Materials**

Dear Judge McAvoy:

We represent the Defendant, Jacob Delaney, in the above matter. On January 26<sup>th</sup> we filed a motion to suppress under seal with an application to seal the same pursuant to the Local Rules and the Protective Order issue in this matter. We now write in response to the Court's Order (Doc. No. 41) that the Defendant publicly file redacted versions of the Memorandum of Law, Attorney Declaration and publicly file all exhibits to the Attorney Declaration which are not covered by the Protective Order.

We conferred with the Government regarding these redactions and sealed exhibits and the Government concurs with our redactions and with our request to seal exhibits B, C, D, E, F and I. The remaining exhibits to the Attorney Declaration (Exhibits A, G and H) will be filed on ECF. Thank you for your attention to this matter.

Very truly yours,

O'CONNELL AND ARONOWITZ

By:

Scott W. Iseman, Esq.

cc: All parties (ECF)

EDWARD J. O'CONNELL  
1925-1939  
SAMUEL E. ARONOWITZ  
1925-1973  
LEWIS A. ARONOWITZ  
1951-1979

---

CORNELIUS D. MURRAY  
STEPHEN R. COFFEY  
JEFFREY J. SHERRIN  
THOMAS J. DiNOVO  
PAMELA A. NICHOLS  
JEFFREY A. SIEGEL  
DAVID R. ROSS  
KURT E. BRATTEN  
MICHAEL P. McDERMOTT  
PETER A. PASTORE  
KEVIN LAURILLIARD  
KELLY J. MIKULLITZ  
WILLIAM F. BERGLUND  
ROBERT J. KOSHGARIAN  
MATTHEW J. DORSEY  
SCOTT W. ISEMAN  
DANIELLE HOLLEY TANGORRE  
FRANCIS J. SMITH, JR.  
PAUL C. PASTORE  
GRAIG F. ZAPPIA  
CHAD A. JEROME

---

OF COUNSEL  
HON. LEONARD A. WEISS  
RICHARD S. HARROW  
MEREDITH H. SAVITT  
PAUL A. FEIGENBAUM  
FLORENCE M. RICHARDSON  
CRISTINA D. COMMISSO  
DANIEL J. TUCZINSKI  
KAREN MARTINO VALLE  
ROLAND M. CAVALIER

---

MICHAEL Y. HAWRYLCHAK  
ANDREW KO  
SAMANTHA L. FEMIA  
MARINA W. CHU

HOLLY E. VEGAS\*  
(DIRECTOR, HEALTHCARE  
CONSULTING GROUP)

\*NOT A MEMBER OF THE  
LEGAL PRACTICE